

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

SHAJUAN GRAY,)	CASE NO. 1:18 CV 2418
)	
<i>Plaintiff,</i>)	JUDGE CHRISTOPHER A BOYKO
)	
vs.)	
)	
CITY OF EUCLID, et al.)	PARTIES' FED. R. CIV. P. 26(f) REPORT
)	
<i>Defendants.</i>)	
)	

1. MEETING:

Pursuant to FED. R. CIV. P. 26(f) and LR 16.3(b), a meeting was held on February 18, 2019, and was attended by:

Counsel for Plaintiff: Sarah Gelsomino
Counsel for Defendants: John D. Pinzone

2. INITIAL DISCLOSURES:

The parties will exchange pre-discovery disclosures required by FED. R. CIV. P. 26(a)(1) and the Court's prior order by February 27, 2019.

3. TRACK ASSIGNMENT:

The parties recommend that the case be placed on the Standard Track.

4. ADR:

Plaintiff and Defendants are amendable to ADR.

5. CONSENT TO MAGISTRATE JUDGE:

The parties do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).

6. RECOMMENDED DISCOVERY PLAN:

(a) Subject, Nature, and Extent of Discovery:

The Parties intend to conduct discovery, including Interrogatories, Requests for Production, and approximately 6-10 depositions, concerning liability and damages, including *Monell* claims.

(b) ESI:

At this time, it is unclear whether this case will involve the production of ESI. Should the need arise, the parties will confer to determine the terms of electronic discovery, and in the event that an agreement cannot be reached, will follow Appendix K to Northern District Ohio Local Rules.

(c) Non-Expert Discovery Cut-off Date:

May 31, 2019

(d) Expert Report(s) Due Date:

June 28, 2019

(e) Rebuttal Expert Report(s) Due Date:

July 29, 2019

(f) Expert Discovery Cut-off Date:

September 16, 2019

7. RECOMMENDED DISPOSITIVE MOTION DATE:

October 15, 2019

8. RECOMMENDED CUT-OFF DATE FOR AMENDING PLEADINGS AND/OR ADDING PARTIES:

April 15, 2019

9. RECOMMENDED DATE FOR A STATUS HEARING:

Mid-point of discovery pursuant to the Court's discretion.

10. OTHER MATTERS FOR THE ATTENTION OF THE COURT:

None at this time.

Respectfully submitted,

FRIEDMAN & GILBERT

/s/ Sarah Gelsomino

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CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2019, a copy of the foregoing was filed electronically.

Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Sarah Gelsomino

SARAH GELSOMINO

One of the Attorneys for Plaintiff